



PUGET SOUND AIR POLLUTION CONTROL AGENCY
KING COUNTY KITSAP COUNTY PIERCE COUNTY SNOHOMISH COUNTY

August 26, 1997

Gerry Brown
Manager, Safety and Environment
Ash Grove Cement Co.
3801 E Marginal Wy S
Seattle, WA. 98134

Dear Mr. Brown:

Ash Grove Cement Plant
Notice of Construction Application No. 6708

Thank you for meeting with Jay Willenberg and me on August 13, 1997 to discuss your Notice of Construction and Application for Approval No. 6708 for an alternate SO₂ emission standard during startup. This letter is a follow-up to the incomplete application letter dated June 10, 1997.

Your current application basically requests that during the preheat phase (before addition of feed) of kiln startup, the current SO₂ startup limit of 200 ppm (as required by Order of Approval No. 5730 approved December 29, 1994) would be dropped and replaced by a maximum main stack flow rate of 84,000 dscfm (normal stack flow is 118,000 dscfm). During the rest of the startup period after feed is added to the kiln, the 200-ppm SO₂ limit would apply. Ash Grove has measured the SO₂ level during one startup period and found a maximum of 563-ppm. It was explained that this information was used as the basis to argue that since the SO₂ emissions during normal operations are about 235 lb/hr, the SO₂ level during startup could not be greater than 47 lb/hr as a maximum value.

We explained our concern that this current application has the appearance of dropping a current SO₂ limit and allowing the equipment to operate as a completely unregulated emission source and that the emission estimates are essentially based on one testing period. We requested that Ash Grove clarify, expand and better define the parameters under which SO₂ emissions would be limited during startup periods. We agreed that Ash Grove would provide a more detailed discussion of how an alternate limit could be defined and how the new limit would be verified for compliance.

Please provide this additional information by September 19, 1997.

If you have any questions please contact me at (206) 689-4055 in Seattle.

Sincerely,

Fred L. Austin
Air Pollution Engineer

mj

cc: D. S. Kircher J. M. Willenberg
E. M. Gilpin M. McAfee

Dennis J. McLerran, Air Pollution Control Officer

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